



**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re**

**MOTORS LIQUIDATION COMPANY, et al  
f/k/a General Motors Corp., et al,**

**Debtors.**

**Chapter 11 Case No.  
09-50026 (REG)**

**(Jointly Administered)**

**MOTION FOR ENFORCEMENT OF OFFER ORDER**

Comes now Jake W. Rodd, a Designated Claimant, and enters this Motion For Enforcement of Offer pursuant to Order dated 2/23/2010, 11 USC S.105(A) and General Order M-39D Authorizing Implementation of Alternate Dispute, and as reason therefore says as follows:

1. The Claimant has filed a Motion For Reconsideration/Rehearing Of Offer, which he wishes to withdraw.
2. This Motion is filed to enforce Order pursuant to 11 U. S. C. (And 105 CA), and General Order M390 authorizing implementation of Alternate Dispute Procedures, including Mandatory Mediation.
3. It is further requested that the Court Subpoena the following individuals to appear for questioning in person or by telephone:

- A. Pablo Fallabella, Esq., 767 Fifth Avenue, New York, New York, email [pablo.fabella@weil.com](mailto:pablo.fabella@weil.com);
- B. Lisa Cudsworth, Claims Administrator-515- GM Central Claims Unit,

P. O. Box 300, mail code 432620 A71, Detroit, Michigan 48265, phone 800-888-0164;

C. Jeremy Sloan, Esq., Union Square, Suite 600, 10101 Reunion Place, San Antonio, Texas, 78216, phone 210477-7400, email W.W.W.Phny.com, Mr. G. Richard Wagoner, Jr., Former GM Chairman and CEO.

4. If there are scheduling conflicts, a continuance is requested in order that all parties may testify.

5. The Claimant attaches for the Court a letter from the U. S. Department of Justice, Civil Division, dated November 2, 2011, and DVD of Signet Diagnostic of Jake Rodd MRI, C/L Spine 117328 dated 4/30/10, which the Claimant asks the Court to urgently review.

6. Prima Facie has been established in this claim, and has been established by paperwork previously submitted to the Court.

7. General Motors actions have also been established through documentation previously sent to the Court. Numerous attempts have been made to reach settlement by the Designated Claimant, and all attempts have been met with no reasonable effort by Attorney Smolinsky, the designated representative of GM, who stated that GM did not take Designated Claimant to be serious. The Designated Claimant believes a broken neck is a serious claim.

8. All aspects of the Designated Claim were processed by the Court and signed by Mr. Smolinski. During the Hearing, attorney Smolinski agreed to Mandatory Mediation. None of the terms of the original Agreement have changed. They are as they were when Judge Gerber signed the Order dated February 23, 2010.

9. The Claimant was advised by Attorney Smolinsky that the Court set aside the Mediation Order, which Order the Claimant has not received.

10. The Claimant has relayed to Mr. Smolinski that he would pay Claimant's cost for Mediation.

11. The Claimant requests the Court to inquire as to who put the Claimant's information on Google, as this done without the Claimant's permission.

WHEREFORE, the Claimant requests the Court as follows:

1. To disregard the Claimant's previously filed Motion For Reconsideration/Rehearing Of Offer;
2. To furnish the Claimant with all paperwork pertinent to the decision for the settlement to be \$5,000.00;
3. Enforcement of Mediation Agreement with Mediator;
4. Allow the Claimant to subpoena witnesses to appear before the Court;
5. Inquire as to who put the Claimant's information on Google;

6. Such other and further relief as the Court deems just and equitable in the premises.

  
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JAKE W. RODD  
111 E. 1<sup>st</sup> St. #26  
Jacksonville, Florida 32206  
(904) 444-0843

I HEREBY CERTIFY that a copy of the foregoing has been furnished to HONORABLE ROBERT E. GERBER, United States Bankruptcy Judge, Room 621, United States Bankruptcy Court Southern District N.Y., One Bowling Green, New York, New York, 10004, to WEIL, GOTSHAL & MANGES LLP, Attorneys for Debtors, 767 Fifth Avenue, New York, New York, 10153, (Attn: Joseph H. Smolinsky, Esq.), Motors Liquidation Company, 500 Renaissance Center, Suite 1400, Detroit, Michigan, 48243 (Attn: Ted Stenger), General Motors, LLC, 300 Renaissance Center, Detroit Michigan, 48265 (Attn: Lawrence S. Buonomo, Esq.), Cadwalader, Wickersham & Taft LLP, One World Financial Center, New York, New York, 10281 (Attn: John J. Rapisardi, Esq.), United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, D. C. 20220, (Attn: Joseph Samarias, Esq.), Vedder Price, P. C., 1633 Broadway, 47<sup>th</sup> Floor, New York, New York, 10019 (Attn: Michael J. Edelman, Esq.), Kramer Levin Naftalis & Frankel LLP, 1177 Avenue of the Americas, New York, New York, 10036, (Attn: Thomas Moers Mayer, Esq.), Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21<sup>st</sup> Floor, New York, New York 10004 (Attn: Diana G. Adams, Esq.) And U. S. Attorney's Office, S. D. N. Y., 86 Chambers Street, Third Floor, New York, New York, 10007 (Attn: David S. Jones, Esq.), Honorable Joseph Biden, Vice President of the United States of America, Washington, D. C., and Barrack Obama, President of the United States of America, Washington, D. C., by United States Mail Delivery, this \_\_\_\_\_ day of December, 2011, A. D.

  
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Jake W. Rodd  
111 East 1<sup>st</sup> St. #26  
Jacksonville, Florida 32206



Civil Division

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Washington, D.C. 20530

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Mr. Jake Rodd  
111 East 1st Street #26  
Jacksonville, Florida 32206

Dear Mr. Rodd:

Thank you for the copy of your letter that you sent to Vice President Joe Biden regarding your claim with the Motors Liquidation Company. Since the subject of your letter falls within the interests of the Department of Justice, the Vice President's staff referred your letter here for response. Due to mail screening procedures, your correspondence was only recently received. We apologize for any inconvenience the delay in response may have caused you.

This letter serves as receipt of your claim letter. We trust that the Motors Liquidation Company will handle your case appropriately.

We thank you again for the copy of your letter to Vice President Biden. Please do not hesitate to contact the Department of Justice if we may be of further assistance with future matters.

Sincerely,



Michael Mayer  
Director of Communications

VP # 10132011-26